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Attorney for Defendants

**IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA**

NICOLE FRANCOISE LATOUR, individually : Civil Action No.
 and on behalf of all others similarly situated, : C 06 3454 (BZ)

Plaintiff,

v.

CLEAR CHANNEL COMMUNICATIONS, : STIPULATION AND
 INC., CLEAR CHANNEL : [PROPOSED] ORDER
 BROADCASTING, INC. :
 and LIVE NATION, INC., :

Defendants.

WHEREAS, plaintiff Nicole Francoise Latour, on behalf of all persons similarly situated,
 filed the above-captioned Class Action Complaint ("Complaint") against Clear Channel
 Communications, Clear Channel Broadcasting, and Live Nation, Inc., (collectively,

1 "Defendants") on May 30, 2006;

2 WHEREAS, there is currently pending before Judge Wilson of the United States District
3 Court for the Central District of California a multi-district litigation entitled *In re Live Concert*
4 *Antitrust Litigation*, 05-MDL-1745 ("MDL-1745") coordinating actions that contain substantially
5 similar claims to those in the above-captioned class action;

6 WHEREAS, on June 1, 2006 the Clerk of the Judicial Panel on Multidistrict Litigation
7 ("JPML") was notified that the above-captioned class action was a potential "tag-along" action
8 pursuant to Rules 7.2(i) and 7.5(e) of the Rules of Procedure of the Judicial Panel on
9 Multidistrict Litigation;

10 WHEREAS, a conditional transfer order of the JPML, once issued, will be unopposed;

11 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

12 1. Defendants hereby waive service of the summons in this action, effective June 15,
13 2006.

14 2. The parties agree to stay all proceedings in the above-captioned action pending its
15 expected transfer by the JPML to the Central District of California for coordination with the
16 actions in MDL-1745.

17 3. Upon the expected transfer of the above-captioned class action, Defendants will
18 answer or otherwise plead in response to the Complaint by August 21, 2006, and the parties will
19 be otherwise bound by the discovery schedule previously agreed to for the actions included in
20 MDL-1745.

21 4. Notwithstanding the foregoing, any party may notify the Court at any time that it
22 wishes to lift the stay of these proceedings, at which point Defendants' pleadings in response to
23 the Complaint shall become due sixty days after the provision of such notice to the Court and
24 counsel.
25

26 ///

1 Dated: June 14, 2006

CHIMICLES & TIKELLIS LLP

2
3 By: 

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Attorneys for Plaintiff and the Class

11 Dated: June 14, 2006

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14 By: 

Jonathan M. Jacobson

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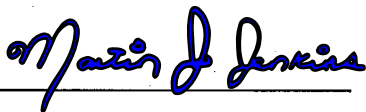
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Attorneys for the Defendants

20 Approved and So Ordered:

21 

23 Hon. Bernard Zimmerman
Hon. Martin J. Jenkins
24 U.S. Magistrate Judge